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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 RASHAUD BLANDBERG, an Individual,

12 Plaintiff,

13 vs.

14 ADVANCED LIGHTING AND
15 ELECTRIC, INC., DOES I -X; ROE
16 CORPORATIONS I -X.

17 Defendant.
18

CASE NO.: 2:19-cv-01519-RFB-BNW

**STIPULATION AND ORDER FOR A
SIXTY (60) DAY EXTENSION OF THE
DISCOVERY SCHEDULE**

(FIRST REQUEST)

19 The parties, Plaintiff RASHAUD BLANDBERG (“**Plaintiff**”) and Defendant
20 ADVANCED LIGHTING AND ELECTRIC, INC. (“**Defendant**”), by and through their
21 respective attorneys of record, hereby stipulate and agree as follows:

22 1. That the close of Discovery currently set for July 20, 2020, be extended by a
23 period of sixty (60) days, and become due on September 18, 2020 or as soon thereafter as the
24 Court may allow;
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1 2. That the deadline to file dispositive motions, currently due on August 19,
2 2020, be extended sixty (60) days, and become due on October 19, 2020 or as soon thereafter
3 as the Court may allow;

4 3. That the deadline to file a pretrial order, currently due September 18, 2020, be
5 extended sixty (60) days, and become due on November 17, 2020 or as soon thereafter as the
6 Court may allow, unless dispositive motions have been filed and not decided and, in that case,
7 thirty (30) days after decision on the dispositive motions or a further court order.

8 4. That the Parties exchanged Initial Disclosures and written discovery requests,
9 including requests for documents, interrogatories, and requests for admissions;

10 5. That the Parties exchanged responses to the written discovery requests;

11 6. That the Parties have recently been conferring about the adequacy of certain of
12 the discovery responses served by Defendant and believe if given additional time, the Parties
13 may be able to resolve their discovery dispute without intervention by the Court;

14 7. That Plaintiff's counsel and Defendants' counsel have been in contact regarding
15 the suitability of extending discovery in this matter based upon the current dispute over the
16 adequacy of the written discovery responses served by Defendant, and the need for resolution
17 of such dispute before the deposition of Defendant may proceed. Both Plaintiff's and
18 Defendant's counsel agree that an extension of the remaining discovery deadlines is warranted
19 for this matter to be fully litigated on the merits and an extension is in the best interests of both
20 the Parties and the Court;

21 8. That the Parties have the following depositions outstanding: Plaintiff, Person
22 Most Knowledgeable for Defendant; Defendant, deposition of the Plaintiff. The Parties have
23 not taken those depositions because the Parties would prefer to complete the exchange of
24

1 written discovery. Without a complete exchange of written discovery, the depositions will not
2 be as meaningful.

3 9. The parties currently have a dispute regarding the Defendant's request for an in-
4 person deposition of Plaintiff. The parties are hopeful that with the additional time, Court
5 intervention in the dispute will not be necessary.
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7 10. The parties have a dispute regarding the topics outlined in Plaintiff's deposition
8 notice for the Person Most Knowledgeable of Advanced Lighting. The parties are hopeful that
9 with the additional time, Court intervention in the dispute will not be necessary. The deposition
10 of the Person Most Knowledgeable, when scheduled, will take place via remote means due to
11 the ongoing Covid pandemic.
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13 11. The parties have agreed on acceptable dates for the deposition of Mr. Domschott
14 and the deposition is anticipated to take place on July 28, 29 or 30, 2020. The deposition of
15 Mr. Domschott will take place via remote means due to the ongoing Covid Pandemic.

16 12. That good cause exists for the request for the Discovery deadline to be extended
17 until September 20, 2020 for the above-specified reasons.
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1 13. This is the parties' first request for an extension of the discovery schedule. All
2 parties believe the requested extension is warranted under the current circumstances and will
3 not result in undue delay in the administration of this cause.

4 Dated: July 17, 2020.

Dated: July 17, 2020.

6 HKM EMPLOYMENT ATTORNEYS
7 LLP

By: /s/ Jenny L. Foley

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13 *Attorneys for Defendant*

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18 IT IS SO ORDERED

19 DATED: 4:03 pm, July 21, 2020

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22 BREND A WEKSLER

23 UNITED STATES MAGISTRATE JUDGE
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